

1 MICHAEL LEHNERS, ESQ.  
2 429 Marsh Ave.  
3 Reno, Nevada 89509  
4 Nevada Bar Number 003331  
5 (775) 786-1695  
6 email michaellehners@yahoo.com  
7 Attorney for Chapter Seven Trustee  
8 Donald Gieseke

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

oOo

10  
11 IN RE

12 PATMONT MOTOR WERKS, INC.,

13 Debtor(s).  
14 \_\_\_\_\_/

BK-N- 12-52799-btb  
CHAPTER 7

Hearing Date: 2/25/15  
and Time: 2:00 p.m.

Mtn No. \_\_\_\_\_

Est Time: 5 Minutes

NOTICE OF COMPETING OFFER TO  
ACQUIRE AND SELL SUBSTANTIALLY  
ALL OF THE ESTATE'S ASSETS

16  
17 COMES NOW Chapter Seven Trustee, Donald Gieseke, by and  
18 through his attorney, Michael Lehnern, Esq. and files Notice of a  
19 Competing Offer to acquire and sell substantially all of the Estate's assets  
20 by Bar None Auctions. A copy of this Offer has been attached hereto as  
21 Exhibit "1" and it will be considered at the February 25, 2015 hearing on  
22 the Trustee's Motion to Sell.

23  
24 Dated: This 12 day of February, 2015

25  
26 By: \_\_\_\_\_

27 Michael Lehnern, Esq.  
28 429 Marsh Ave.  
Reno, Nevada 89509  
Nevada Bar Number 003331

# Exhibit 1

# Exhibit 1



Michael Lehnors, Esg.  
429 Marsh Avenue  
Reno Nevada 89509

February 11, 2015

RE: Patmont Motor Works  
2589 Wild Horse, Minden Nevada 89423

Bar None Auction offers our services to prepare and conduct a live auction on behalf of the US Bankruptcy court. I hereby guarantee the sale value of no less than \$150,000.00 net proceeds. Bar None rates for this service are 25% sale commission all admin fee's include in commission.

This offer is made irrespective to any outstanding securities on the assets.

Zeb Seidel  
President & Auctioneer  
(916) 343-4200  
[zeb@barnoneauction.com](mailto:zeb@barnoneauction.com)

**CERTIFICATE OF SERVICE BY MAIL**

Pursuant to Federal Rule of Civil Procedure 5(b), I certify that on the 12  
day of February, 2015 I deposited for mailing in the United States Post Office  
in Reno, Nevada, with postage thereon fully prepaid, a true copy of the within

**NOTICE OF COMPETING OFFER TO ACQUIRE AND SELL SUBSTANTIALLY**

**ALL TO THE ESTATE'S ASSETS** addressed as follows:

W. Donald Gieseke  
18124 Wedge Parkway  
Suite 518  
Reno, NV 89511

Alan R Smith  
505 Ridge St  
Reno, Nv 89501

U. S. Trustee  
300 Booth Street  
Room 3009  
Reno, NV 89509

Marvin C. Ruth  
Lewis And Roca  
40 N. Central Avenue, Suite 1900  
Phoenix, Az 85004

Marvin C. Ruth  
Lewis And Roca  
50 West Liberty, Suite 410  
Reno, Nv 89501

Louis Bubala, Esq.  
Kaempfer Crowell  
50 W. Liberty St. Suite 700  
Reno, NV 89501

  
Dolores Stigall